

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN

In re:)
)
) Case No. 13-33767-mdm
) Chapter 13
THOMAS J. ZOVAR,)
JUDIT M. ZOVAR,)
)
)
Debtors.)

OBJECTION TO TRUSTEE'S MOTION TO DISMISS

Please take notice that the debtors, Thomas J. Zovar and Judit M. Zovar, by their attorneys, DeLadurantey Law Office, LLC, by Nathan E. DeLadurantey, hereby object to the Motion to Dismiss as brought by Mary B. Grossman, Chapter 13 Trustee.

The debtors assert that they are ready and able to file an amended plan to account for the unsuccessful Mortgage Modification Mediation and request time to do so.

The debtors respectfully request that the Court schedule a hearing on the matter.

Dated: July 21, 2014.

DeLadurantey Law Office, LLC
Attorneys for Debtors

/s/

By: Nathan E. DeLadurantey
State Bar No.1063937

Drafted by:
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EASTERN DISTRICT OF WISCONSIN

In re:)	
THOMAS J. ZOVAR and)	Case No. 13-33767-mdm
JUDIT M. ZOVAR,)	Chapter 13
)	
Debtors.)	

CERTIFICATE OF SERVICE

Caitlin York states under oath that she is over the age of 18 and a paralegal at DeLadurantey Law Office, LLC, attorneys for the debtors, and that on July 21, 2014, she delivered true and correct copies of the attached “Objection to Trustee’s Motion to Dismiss” and “Certificate of Service” via the CM/ECF system or first-class mail to the following parties:

Clerk, U.S. Bankruptcy Court
Eastern District of Wisconsin
via CM/ECF

Trustee Mary B. Grossman
via CM/ECF

Office of the United States Trustee
via CM/ECF

I certify under penalty of perjury that the foregoing is true and correct.

Executed on July 21, 2014.

Signed: /s/ Caitlin York
Caitlin York

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